

THOMAS A. JOHNSON, #119203
MONICA A. QUINLAN, #325465
Law Office of Thomas A. Johnson
400 Capitol Mall, Suite 2560
Sacramento, California 95814
Telephone: (916) 422-4022

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No.: 2:22-cr-00161-JAM
Plaintiff,)	
vs.)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE
)	Date: November 15, 2022
)	Time: 9:00 a.m.
JAMES MECHAM, et al.)	Judge: Hon. Judge John A. Mendez
Defendants)	

STIPULATION

Plaintiff United States of America, by and through its attorney of record, Assistant United States Attorney HEIKO COPPOLA, and defendant JAMES MECHAM, both individually and by and through his counsel of record, Thomas A. Johnson and Monica A. Quinlan, defendant KURT STOCKS, both individually and by and through his counsel of record, Malcolm S. Segal, and defendant HEIDI EDWARDS, both individually and by and through her counsel of record, Christina Sinha, hereby stipulate as follows:

1. By previous order, this matter was set for Status Conference on November 15, 2022.
2. By this stipulation, defendant now moves to continue the Status Conference to January 31, 2023, at 9:00 a.m., before the Honorable Judge John A. Mendez.
3. The parties agree and stipulate, and request the Court find the following:

- a. A continuance is requested because counsel for all defendants need additional time to review the discovery, conduct investigation, evaluate the case, and discuss a potential resolution.
 - b. Counsel for all defendants believe the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
 - c. The Government does not object to the continuance.
 - d. Based on the above-stated findings, the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendants in a speedy trial within the original date prescribed by the Speedy Trial Act.
 - e. For the purpose of computing time under the Speedy Trial Act, 18 United States Code Section 3161(h)(7)(A) within which trial must commence, the time period of November 15, 2022, to January 31, 2023, inclusive, is deemed excludable pursuant to 18 United States Code Section 3161(h)(7)(A) and (B)(iv), corresponding to Local Code T-4 because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.
4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

DATE: November 4, 2022

/s/ Thomas A. Johnson
THOMAS A. JOHNSON
Attorney for James Mecham

1 DATE: November 4, 2022

/s/ Monica A. Quinlan
MONICA A. QUINLAN
Attorney for James Mecham

2
3
4
5 DATED: November 4, 2022

PHILIP A. TALBERT
Acting United States Attorney

6
7 /s/ Heiko Coppola
HEIKO COPPOLA
Assistant U.S. Attorney

8
9 DATE: November 4, 2022

10 /s/ Malcolm S. Segal
MALCOLM S. SEGAL
Attorney for Kurt Stocks

11
12 DATE: November 4, 2022

13 /s/ Christina Sinha
CHRISTINA SINHA
Attorney for Heidi Edwards

14
15
16
17
18 **ORDER**

19
20 **IT IS SO ORDERED.**

21
22 DATE: November 8, 2022

23 /s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE